

EXHIBIT 4

Page 1

UNITED STATES DISTRICT COURT
FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

WARREN HILL, LLC,)
Plaintiff,)
)
-vs-) No. 2:18-01228-HB
)
SFR EQUITIES, LLC,)
Defendant.)

The VIDEOTAPED deposition of BRIAN HYNES,
called by the plaintiff for examination, pursuant to
notice and pursuant to the Rules of Civil Procedure for
the United States District Courts, taken before Marcie A.
Haw, CSR in and for the County of Cook and State of
Illinois, on October 17th, 2018 at 200 South Michigan
Avenue, Suite 1100, Chicago, Illinois.

Page 2

1 There were present at the taking of this
2 deposition the following counsel:

3

4 ELLIOTT GREENLEAF, P.C., by
5 MR. GREGORY VOSHELL
6 MR. LOUIS BALLEZZI
7 925 Harvast Drive, Suite 300
8 Blue Bell, Pennsylvania 19422
9 Phone: (215) 977-1000
10 E-mail: Elliottgreenleaf.com
11 on behalf of the Plaintiff
12 Warren Hill;

13

14 HOWARD AND HOWARD by
15 MR. SCOTT LEVIN
16 200 South Michigan Avenue, Suite 1100
17 Chicago, Illinois 60604
18 Phone: (312) 456-3641
19 E-mail: Slevin@howardandhoward.com
20 on behalf of the Defendant
21 Vendor Assistance Program and
22 Brian Hynes;

23 WHITE & WILLIAMS by
24 MR. MICHAEL N. ONUFRAK
1 1650 Market Street
2 One Liberty Place, Suite 1800
3 Philadelphia, Pennsylvania 19103
4 Phone: (215) 864-7174

5

6 on behalf of the Defendant
7 SFR Equities;

8

9 ALSO PRESENT: Videographer, Jeff Wilhite.

10

11

12

13

14

Page 3

1

I N D E X

2

WITNESS

3

Brian Hynes

4

PAGE

5

Examination by Mr. Voshell 5

6

7

E X H I B I T S

8

PAGE

9

10

Previously Marked Warren Hill No. 52 79

11

Previously Marked Warren Hill No. 5 88

12

Previously Marked Warren Hill No. 41 91

13

Hynes Deposition Exhibit No. 84 93

14

Hynes Deposition Exhibit No. 85 95

15

Previously Marked Warren Hill No. 22 97

16

Previously Marked Warren Hill No. 64 100

17

Previously Marked Warren Hill No. 65 102

18

Previously Marked Warren Hill No. 45 104

19

Hynes Deposition Exhibit No. 86 106

20

Hynes Deposition Exhibit No. 87 111

21

22

23

24

1 Bluestone Capital Markets, correct?

2 A. Correct.

3 Q. And that was -- That company was created in
4 March of 2017, correct?

5 A. Sometime around there, yes.

6 Q. Could you please describe what, if anything,
7 your role is with Bluestone Capital Markets?

8 A. Already have; manager.

9 Q. Fair point. From a day-to-day standpoint what
10 do you do for Bluestone Capital Markets?

11 A. Whatever's asked of me.

12 Q. And what type of things are asked of you?

13 A. I can't think of anything right now.

14 Q. And to the extent that something was asked of
15 you, who would do the asking?

16 A. Probably David Reape or Allen Wilson.

17 Q. Forgive me if we already touched on this, but
18 David Reape is the CEO of Bluestone Capital Markets?

19 A. Yes.

20 Q. Does Mr. Harris have any position with
21 Bluestone Capital Markets other than his role as a
22 manager?

23 A. No.

24 Q. So if Mr. Harris was asking you to do